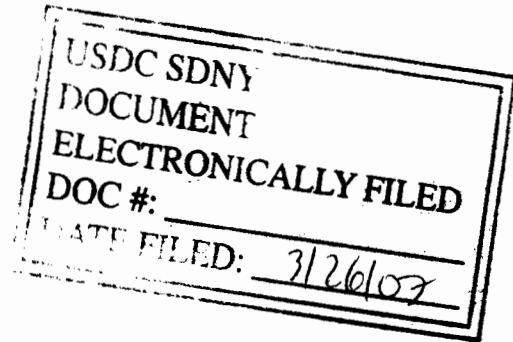


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**BY HAND DELIVERY**

March 12, 2007

Hon. Kenneth M. Karas  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street -- Room 920  
New York, New York 10007-1312

**Re: Concepcion v. City of New York, et al., 05CV8501 (KMK)(JCF)**

Dear Judge Karas:

Over a month prior to the filing of our answering papers on the motion to dismiss the claim against the Republican National Committee in the above-referenced matter, we requested of Corporation Counsel that the confidentiality of the indemnification and security clauses of the Site City Agreement, comprising key segments of our answering papers and proposed Second Amended Complaint, be de-designated.

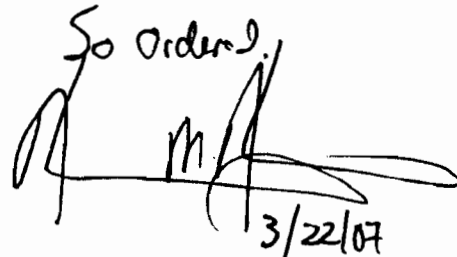
The filing of the papers was scheduled for March 1, 2007. We filed redacted copies of our papers on that date, pursuant to the urging of Corporation Counsel, Jeffrey Dougherty. Nonetheless, we were just informed on March 8, 2007, that defendants now agree to de-designate the confidentiality of said clauses. . Enclosed is a copy of Mr. Dougherty's letter to Magistrate Francis regarding said issue.

We therefore request that this Honorable Court permit the re-filing of the un-redacted papers, so that the formal filings in this matter may be complete.

Respectfully submitted,

  
KAREN WOHLFORTH, ESQ.

Cc: Jeffrey A. Dougherty, Esq.  
Special Assistant Corporation Counsel  
By facsimile (212) 788 9776

  
So Ordered,  
3/22/07



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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March 8, 2007

**BY FACSIMILE**

The Honorable James C. Francis IV  
United States Magistrate Judge, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1960  
New York, New York 10007-1312

Re: *Concepcion v. City of New York, et al.* 05-CV-8501 (KMK)(JCF)

Dear Judge Francis:

Defendants write in response to plaintiff's February 13, 2007 letter. The timing of Defendants' response is based on the parties efforts during the past few weeks to resolve the issues raised in plaintiff's letter and preserve judicial economy. Specifically, the parties have resolved the issues related to providing plaintiff courtesy copies of the TARU evidence that has been available for over a year. The parties alerted plaintiff of the date Commissioner Cohen will be available for his deposition. Defendants also agreed to de-designate the confidentiality of the indemnification and security clauses of the Site City Agreement.

One issue remains outstanding. Defendants are still arranging former Assistant Chief McManus' deposition date and expect to alert plaintiff of potential dates shortly. The fact that Mr. McManus is retired has posed some logistical issues in contacting him and ascertaining his availability. Defendants expect to schedule his deposition date shortly.

Very truly yours,

  
Jeffrey A. Dougherty

cc: Karen D. Wohlforth, Esq. (by Facsimile)  
Zelda Stewart, Esq. (by Facsimile)